

## REMARKS

Independent claim 1 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Etzel in view of Doland. The examiner concedes that Etzel does not disclose reordering blocks of an original content item according to a generated symmetrical key. Paper No. 20061206, page 3. Doland does not cure the deficiency of Etzel.

Like Etzel, Doland has nothing to do with block reordering. For example, Doland explains that in a block cipher, a message is *encrypted one block at a time*. Column 2, lines 30-35. For example, a block cipher breaks a message into blocks, and encrypts and decrypts the message blocks. Column 7, lines 10-13.

Specifically, in Doland's bit position permutations, each bit in a message block is treated as an object. Column 7, line 55-column 8, line 53. Referring to Figure 1 of Doland, there is only one message block shown at 106. The *bits* comprising the eight-bit message block are permuted to encrypt the message block 108. Thus, Doland's bit permutation deals with encryption *within* a single block and not reordering the actual blocks of a content item.

Similarly, in Doland's bit pattern permutation he mutates only one message block. Referring to Figure 3, there is one message block 306, which is three bits long. There are eight possible permutations of the three-bit message block but all eight permutations are of the exact same message block. Column 9, lines 17-59. Thus, Doland does not reorder blocks that make up a content item but rather mutates the entire block many different ways. Because neither Etzel nor Doland have anything to do with block reordering as claimed in amended claim 1, this claim and claims dependent thereon are patentably distinguished over the cited art.

Under similar analysis, amended claims 79 and 91 and respective dependent claims are also believed to be patentably distinguished over the cited art.

### Claim 9

Claim 9 depends from claim 1 and recites wherein the reordered blocks include a first reordered block of a first block size and a second reordered block of a second block size which is different from the first block size. Doland's message block 106 is eight bits or three bits. Column 7, line 56-column 8, line 20. But there is nothing in the cited portions

of Doland that discloses two different sized blocks of an original content item being reordered with respect to each other. For example, if the three-bit block is a first block of an original content item and the eight-bit block is a second block in the content item, there is nothing in Doland to suggest that the blocks of different sizes are reordered with respect to each other. Rather, the bits within the individual blocks may be reordered.

Additionally, there is nothing in Doland that says that the three-bit block and the eight-bit block are both within the same original content item. As understood by Doland's explanation, both are separate message blocks. Accordingly, the rejection of claim 9 is specifically traversed.

#### **Claim 28**

Claims 27 and 28 both depend from claim 1 and both recite that the apparatus further comprises a storage device. Claim 27 recites that the reorderer reorders blocks of the original content item and stores them to the storage device according to *a logical addressing system of the apparatus*. In contrast, claim 28 recites the reorderer reorders blocks of the original content item by directly manipulating the *physical addresses at which the blocks are stored to the storage device*.

As is explained above, Doland does not disclose reordering blocks. As such, Doland does not disclose reordering blocks of an original content item by directly manipulating the physical addresses as claimed in claim 28. Furthermore, the examiner cites to the exact same portions of Doland to reject both claims 27 and 28. It is respectfully submitted that the examiner cannot have it both ways—the same disclosure cannot teach both logical addressing according to logical addressing of the apparatus and manipulating the physical addresses.

Because Doland does not specifically teach direct manipulation of the physical addresses in which bits, much less *blocks*, are stored, the rejection of claim 28 is specifically traversed.


## CONCLUSION

In view of the amendments and remarks herein, the application is believed to be in condition for allowance. The examiner's prompt action in accordance therewith is respectfully requested.

The commissioner is authorized to charge any additional fees, including extension of time fees, or credit any overpayment to Deposit Account No. 20-1504 (ITL.0778US).

Respectfully submitted,

Date: March 8, 2007

A handwritten signature in black ink, appearing to read "Rhonda L. Sheldon", is written over a horizontal line.

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